

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Bankruptcy Court
Southern District of Texas
FILED

JUN 09 2010

UNITED STATES OF AMERICA
Plaintiff

v.

\$14,817.00 IN U.S. CURRENCY
Defendant

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CIVIL ACTION NO.

4:10-cv-00968

David J. Bradley, Clerk of Court

ORIGINAL

ANSWER TO COMPLAINT FOR FORFEITURE IN REM
(INCLUDING CLAIM AGAINST \$14,817.00 IN U.S. CURRENCY)

COMES NOW INTEREST HOLDER Mehwish Adhi (hereinafter "Adhi") and files this claim for return of her rightful property and shows this Court the following:

1.

Adhi admits the allegations stated in paragraph 1.

2.

Adhi admits the allegations stated in paragraph 2.

3.

Adhi admits the allegations stated in paragraph 3.

4.

Adhi admits the allegations stated in paragraph 4.

5.

Adhi admits the reporting requirements of the statutes cited however Adhi denies that she knowingly attempted to transport a monetary instrument valued at more than \$10,000 out of the United States.

6.

Adhi admits that she was about to leave the United States on February 27, 2010 aboard Emirates flight 212 and Adhi admits that she stated to the CBP officer that she was carrying \$7,317.00.

7.

Adhi admits that a CBP Officer found that Adhi was carrying \$14,817.00. Adhi denies that she told the CBP Officer that she knowingly was carrying \$14,817.00. Adhi admits that \$14,817.00 was seized by CBP Officials.

8.

Paragraph 8 does not require that Adhi either admit or deny any of the allegations stated therein. Adhi denies that forfeiture is a proper remedy under the facts of this case or 31 U.S.C. §5316.

CLAIM BY OWNER OR INTEREST HOLDER

Adhi further shows this Court that she has a valid claim and interest in the \$14,817.00 in U.S. currency which the government alleges is subject to forfeiture.

9.

The money being carried by Adhi included \$7,317.00 of her own money and a wrapped package belonging to her sister which contained \$7,500.00. Adhi had no specific knowledge of the contents of the package given to her by her sister and being carried in Adhi's luggage.

10.

The \$7,317.00 being carried by Adhi was a combination of money she had saved over time and a gift from her brother, Kashan (Sean) Adhi, who owns and operates a used car business in Lilburn, Georgia. The money was being carried back to Pakistan for support of family members.

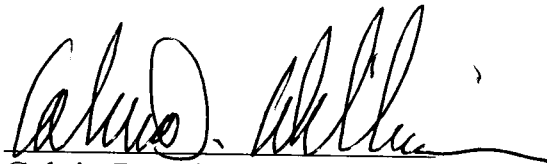
11.

Adhi is informed and believes that most of the \$7,500 belonging to her sister was a gift from Kashan (Sean) Adhi to be distributed to family members in Pakistan. Adhi is informed and believes that a small portion of the \$7,500 was money saved over time by her sister.

WHEREFORE, Claimant Mehwish Adhi prays

1. That the Court return to Mehwish Adhi the sum of \$14,817.00 in U.S. currency; and,
2. That the Court grant such other and further relief as to the Court seem reasonable and just.

Respectfully submitted the 4th day of June, 2010.

A handwritten signature in black ink, appearing to read 'Calvin D. Williamson', written over a horizontal line.

Calvin D. Williamson
Georgia Bar # 765050
Attorney for Claimant

195 West Pike Street, Suite 203
Lawrenceville, Georgia 30045
Telephone: (770) 338-9015
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Email: calvin30044@bellsouth.net

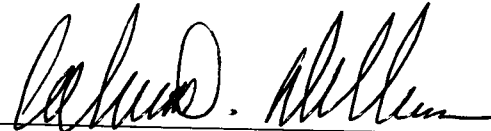
VERIFICATION

Personally appeared before me the undersigned officer duly authorized to administer oaths, **MEHWISH ADHI**, who, after being sworn, states that the information contained in the foregoing Answer to Complaint for Forfeiture is true and correct.

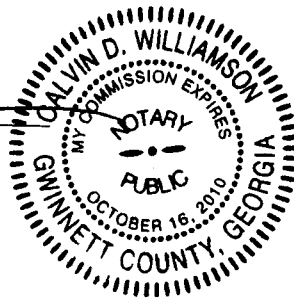


MEHWISH ADHI

Sworn to and subscribed before me
This 4th day of June, 2010.



Notary Public
My commission expires:



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA
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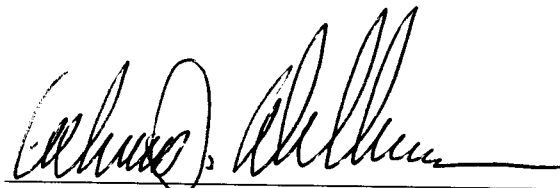
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served a true and correct copy of the Answer to Complaint for Forfeiture in Rem (Including Claim Against \$14,817.00 in U.S. Currency) on the U.S. Attorney by depositing a copy of same in the U.S. mail, with first class postage prepaid, addressed as follows:

Albert Ratliff, Esq.
P.O. Box 61129
Houston, Texas 77208

Respectfully submitted this 7th day of June, 2010.



Calvin D. Williamson
Georgia Bar No. 765050

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